



January 5, 2016

Mr. John Shen

American Lending Center, LLC (formerly US Employment Development Lending Center, LLC)

1 World Trade Center, Suite 1130

Long Beach, CA 90831

Re: Acknowledgement of Regional Center Name Change
US Employment Development Lending Center, LLC changed name to American
Lending Center, LLC
RCW1031910173 / ID1031910173

This notice is in reference to the notification of a regional center name change that was sent via email to the U.S. Citizenship and Immigration Services (“USCIS”) on November 13, 2015 by US Employment Development Lending Center, LLC, a regional center designated under the Immigrant Investor Program on April 12, 2010. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1828).¹

I. Acknowledgement

Effective November 2, 2015, USCIS acknowledges the regional center’s name change as follows:

“US Employment Development Lending Center, LLC” has changed its name to “American Lending Center, LLC”.

II. Additional Guidelines for Filing Form I-526 Petitions

In conjunction with addressing all the requirements for an individual immigrant investor petition, in addition to the guidelines and requirements listed in the regional center’s approval notice and designation letter, each individual petition shall also contain the following, in order to demonstrate that it is affiliated with American Lending Center, LLC:

1. A copy of this acknowledgement notice, the regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).

III. Designee’s Responsibilities in the Operations of the Regional Center

¹ Section 610 of the Departments of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act, 1993, Pub. L. 102-395, as amended by section 116 of Pub. L. No. 105-119, 111 Stat. 2440 (1997); section 402 of Pub. L. No. 106-396, 114 Stat. 1637 (2000); section 11037 of Pub. L. No. 107-273, 116 Stat. 1758 (2002); section 4 of Pub. L. No. 108-156, 117 Stat. 1944 (2003); section 1 of Pub. L. No. 112-176, 126 Stat. 1325 (2012); and section 575 of Pub. L. No. 114-96, 129 Stat. 2193 (2015) (hereinafter “Appropriations Act”).

American Lending Center, LLC

ID1031910173

RCW1031910173

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As provided in 8 CFR § 204.6(m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS.

The regional center must continue to monitor all investment activities under its sponsorship and maintain records in order to provide the information required on the Form I-924A, Supplement to Form I-924. Form I-924A, Supplement to Form I-924 is available in the “Forms” section on the USCIS website at www.uscis.gov.

Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A in that year. The Form I-924A with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

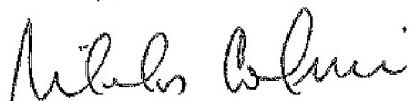
IV. Legal Notice

The acknowledgement of this name change as well as the approval and designation of a regional center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such regional center. Except as expressly set forth in this acknowledgement of name change, USCIS has not reviewed any information provided in connection with or otherwise related to the regional center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a regional center. Accordingly, USCIS makes no determination or representation whatsoever regarding the compliance of either the regional center or associated new commercial enterprises with such laws.

Each regional center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the regional center. The failure of an associated new commercial enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the regional center designation.

If the regional center has any questions concerning the regional center designation under the Immigrant Investor Program, please contact USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,



Nicholas Colucci

Chief, Immigrant Investor Program

American Lending Center, LLC

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cc:



(b)(6)

U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services
Immigrant Investor Program
131 M Street, NE, Mailstop 2235
Washington, DC 20529



**U.S. Citizenship
and Immigration
Services**

April 10, 2017

John Shen
c/o US Employment Development Lending Center
1 World Trade Center, Suite 1180
Long Beach, CA 90831

Application: Form I-924, Application for Regional Center under the Immigrant Investor Pilot Program

Applicant(s): American Lending Center, LLC (Formerly known as US Employment Development Lending Center)

Re: Request to Amend Regional Center Designation
(b)(4)

RCW1526752996/ID1031910173

This notice is in reference to the Form I-924, Application for Regional Center Under the Immigrant Investor Pilot Program that was filed by the applicant with the U.S. Citizenship and Immigration Services ("USCIS") on September 24, 2015. The Form I-924 application was filed to request approval of an amendment to a previously approved regional center designation under the Immigrant Investor Program. The Immigrant Investor Program was established under § 610 of the Department of Commerce, Justice and State, the Judiciary, and Related Agencies Appropriations Act of 1993 (Pub. L. 102-395, Oct. 6, 1992, 106 Stat. 1874).

I. Executive Summary of Adjudication

- A. Effective the date of this notice, USCIS approves the (b)(4) project based on the evidence submitted with the above referenced Form I-924 and exemplar Form I-526. The (b)(4) applicant has shown by a preponderance of the evidence that the (b)(4) will be a new commercial enterprise (NCE) and that the project is likely to result in the creation of at least 737.2 jobs. USCIS will give deference to the applicant's estimates of actual job creation and economic analysis, the business plan, and the organizational documents, offering memorandum, and investment agreements in subsequent related filings of any Form I-526 filed by an individual investor associated with the (b)(4) project. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law). (b)(4)

American Lending Center, LLC (Formerly known as US Employment Development Lending Center
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II. Procedural History

On April 12, 2013, USCIS approved the American Lending Center formerly known as US Employment Development Lending Center, LLC for participation in the Immigrant Investor Program. Based on the initial designation, the US Employment Development Lending Center obtained approval for the following geographic areas and industry categories.

Geographic Area		
State	Counties/Cities	Approval Date
California	Entire State	April 12, 2013

Industry Categories		
NAICS	Industry Name	Approval Date
2362	Nonresidential Building Construction	April 12, 2013
5413	Architectural, Engineering, and Related Services	April 12, 2013
5311	Lessors of Real Estate	April 12, 2013

III. Amendment Request¹

Effective the date of this notice, USCIS approves the applicant's amendment request to incorporate the following change(s):

A. Economic Analysis and underlying Business Plan Change

USCIS approves the applicant's amendment request to include the following actual capital investment project(s) supported by an exemplar Form I-526:

Project	Type of Project	Organization Documents	(b)(4)	Date of Document
(b)(4)	Exemplar Form I-526 Petition Project	Private Placement Memorandum		September 9, 2015
		Subscription Agreement		September 24, 2015
		Business Plan for [REDACTED]		August 14, 2015
		Economic Impact Analysis		September 2, 2015
		Operating Agreement [REDACTED] Two LLC	(b)(4)	September 15, 2015

¹ These industry codes are used for informational purposes in estimating job creation and do not limit the economic or job creating activity of an approved regional center or its investors. Jobs created in industries not previously identified in the economic methodology may still be credited to the investors in subsequent Form I-526 and Form I-829 filings, as long as the evidence in the record establishes that it is probably true that the requisite jobs are estimated to be created, or have been created, in those additional industries.

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Note: If material changes to this project and its supporting documents are found in a subsequent Form I-526 petition or Form I-829, Petition by Entrepreneur to Remove Conditions, USCIS will review the supporting documents once more to ensure continued compliance with EB-5 program requirements.

The requested amendment includes an exemplar proposing investment in a new commercial enterprise ("NCE")

		(b)(4)
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IV. Job Creation

The job creation methodology presented in the economic impact analysis and underlying business plan is found to be reasonable based on the following inputs, when applying the RIMS II economic model:

NAICS	Industry Name	Input (2010 \$Mil)	Multiplier	Total Jobs
2362	Non-Residential Building Construction			
5413	Architectural, Engineering and Related Services			
5311	Lessors of Real Estate			
Total Jobs		(b)(4)		
Does not sum, due to rounding.				

The approval of this Form I-924 application, supported by the exemplar Form I-526 petition, is based upon the assumptions and estimates used as inputs in the business plan for job creation. Please refer to the input and multiplier analysis table above.

The economic analysis accurately portrays the assumptions stated in the business plan, and the calculations using RIMS II multipliers are verifiable. The applicant has shown by a preponderance of the evidence that the project is expected to result in the creation of approximately [redacted] obs. (b)(4)

USCIS will give deference to the job creation methodology when adjudicating Forms I-526 and I-829 associated [redacted]. Deference, however, will not apply if the underlying facts have materially changed, there is evidence of fraud or misrepresentation in the record of proceeding, or the previously favorable decision is determined to be legally deficient (involved an objective mistake of fact or law).

(b)(4)

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It will be the responsibility of the individual investor to demonstrate that the assumptions and estimates presented as inputs to the job creation methodology remain materially unchanged when he or she files a Form I-526. When filing Form I-829 for removal of conditional status, the individual investor has the burden of demonstrating that the assumptions and estimates presented as inputs to the job creation methodology have not materially changed and have been realized (or can be expected to be realized within a reasonable time). If the assumptions and estimates presented as inputs to the job creation methodology have materially changed, an updated business plan and economic analysis may need to be submitted to establish eligibility.

If the job creation estimated in the business plan and economic analysis will not be realized, then it will be the responsibility of the EB-5 investor to notify USCIS of an agreed upon methodology to allocate job creation among eligible investors.

V. Guidelines for Filing Form I-526 Petitions based on the [REDACTED] project (b)(4)

Each individual petition, in order to demonstrate that it is affiliated with the American Lending Center, LLC, in conjunction with addressing all the requirements for an individual immigrant investor petition, shall also contain the following:

1. A copy of this regional center approval notice and designation letter including all subsequent amendment approval letters (if applicable).
2. An economic impact analysis which reflects a job creation methodology required at 8 CFR § 204.6(j)(4)(iii) and shows how the capital investment by the individual immigrant investor will more likely than not create ten (10) jobs.
3. A comprehensive, detailed and credible business plan for an actual project that contains the factual details necessary to be in compliance with the requirements described in Matter of Ho.
4. Legally executed organizational documents of the commercial enterprise. The documents may be the same documents noted in Section III of this approval notice.
5. If the project timeline has changed significantly from the original business plan, a narrative that explains the changes in the project timeline, along with a timeline that realistically reflects the status of the project should be submitted.

VI. Designee's Responsibilities in the Operations of the Regional Center

As provided in 8 CFR § 204.6 (m)(6), to ensure that the regional center continues to meet the requirements of section 610(a) of the Appropriations Act, a regional center must provide USCIS with updated information to demonstrate the regional center is continuing to promote economic growth, improved regional productivity, job creation, and increased domestic capital investment in the approved geographic area. Such information must be submitted to USCIS on an annual basis or as otherwise requested by USCIS. The applicant must monitor all investment activities under the sponsorship of the regional center and to maintain records in order to provide the information required on the Form I-924A Supplement to Form I-924. Form I-924A, Supplement to Form I-924 Application is available in the "Forms" section on the USCIS website at www.uscis.gov.

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Regional centers that remain designated for participation in the Immigrant Investor Program as of September 30th of a calendar year are required to file Form I-924A Supplement in that year. The Form I-924A Supplement with the required supporting documentation must be filed on or before December 29th of the same calendar year.

The failure to timely file a Form I-924A Supplement for each fiscal year in which the regional center has been designated for participation in the Immigrant Investor Program will result in the issuance of an intent to terminate the participation of the regional center in the Immigrant Investor Program, which may ultimately result in the termination of the designation of the regional center.

The regional center designation is non-transferable.

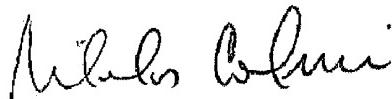
VII. Legal Notice

This approval and designation of a Regional Center under the Immigrant Investor Program does not constitute or imply an endorsement or recommendation by USCIS, the United States Government or any instrumentality thereof, of the investment opportunities, projects or other business activities related to or undertaken by such Regional Center. Except as expressly set forth in this approval and designation, USCIS has not reviewed any information provided in connection with or otherwise related to the Regional Center for compliance with relevant securities laws or any other laws unrelated to eligibility for designation as a Regional Center. Accordingly USCIS makes no determination or representation whatsoever regarding the compliance of either the Regional Center or associated New Commercial Enterprises with such laws.

Each Regional Center designated by USCIS must monitor and oversee all investment offerings and activities associated with, through or under the sponsorship of the Regional Center. The failure of an associated New Commercial Enterprise to comply with all laws and regulations related to such investment offerings and activities may result in the issuance by USCIS of a notice of intent to terminate the Regional Center designation.

If the applicant has any questions concerning the regional center designation under the Immigrant Investor Program, please contact the USCIS by email at USCIS.ImmigrantInvestorProgram@uscis.dhs.gov.

Sincerely,



Nicholas Colucci
Chief, Immigrant Investor Program

(b)(6)

Worley, Jordan P

From: [REDACTED]
Sent: Thursday, November 16, 2017 2:35 PM
To: USCIS Immigrant Investor Program
Subject: I-526 Case Status Inquiry -- American Lending Center, LLC -- RCW1526752996
Attachments: MC2 Project Exemplar Approval.pdf

Dear Immigration Officer:

We are sending a I-526 case status inquiry for the below listed EB-5 Investors that invested in [REDACTED] an (b)(4) Exemplar approved project (please see attached). We kindly request a case status update and urge that the petitions for this approved project be adjudicated as soon as possible.

Regional Center Name: American Lending Center, LLC

Receipt Number: RCW1526752996

NCE Name: [REDACTED]

(b)(4)

[REDACTED] (b)(6)

Please let us know if you need additional information or documentation. Thank you very much for your time and commitment to the EB-5 Program.

Kind Regards,

[REDACTED] (b)(6)



Worley, Jordan P

From: [REDACTED]
Sent: Friday, March 31, 2017 3:11 AM
To: USCIS Immigrant Investor Program
Cc: [REDACTED]
Subject: Re:RCW1635754948 - Courtesy Request for Clarification - Form I-924(Project: AMERICAN LENDING CENTER ARIZONA LLC)

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Officer,

I am writing to request a quick update on the status of this I-924 petition. Please let me know if there is anything else I need to provide. Thanks.

John Shen

Original

From: "USCIS Immigrant Investor Program" <USCIS.ImmigrantInvestorProgram@uscis.dhs.gov>;
Date: Wed, Mar 15, 2017 11:50 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RCW1635754948 - Courtesy Request for Clarification - Form I-924(Project: AMERICAN LENDING CENTER ARIZONA LLC)

Dear Mr. John Shen,

On December 22, 2016, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1635754948.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,

Immigrant Investor Program Office

CT0020

(b)(6)

Worley, Jordan P

From: John Shen [REDACTED]
Sent: Thursday, March 16, 2017 8:37 AM
To: USCIS Immigrant Investor Program [REDACTED]
Cc: [REDACTED]
Subject: RE: RCW1635754948 - Courtesy Request for Clarification - Form I-924 (Project: AMERICAN LENDING CENTER ARIZONA LLC)

Follow Up Flag: Follow up
Flag Status: Completed

Dear Officer,

There are no additional management agencies or principals besides the three listed in the business plan. The full legal names and dates of birth for the regional center members are:

John Shen - Principal and Chief Executive Officer - [REDACTED]

Stella Zhang - Chief Operating Officer [REDACTED]

Bruce Thompson - President and Managing Director [REDACTED]

Please do not hesitate to contact us if you have any further questions or concerns. Thank you.

John Shen – Chief Executive Officer

Regional Centers Holding Group Inc.



1 World Trade Center, Suite 1130, Long Beach, CA 90831
562-449-0139 office • 562-449-0079 fax

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From: USCIS Immigrant Investor Program [mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov]

Sent: Wednesday, March 15, 2017 8:51 AM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: RCW1635754948 - Courtesy Request for Clarification - Form I-924 (Project: AMERICAN LENDING CENTER ARIZONA LLC)

Dear Mr. John Shen,/Dear [REDACTED]

On December 22, 2016, you filed Form I-924, Application for Regional Center Under the Immigrant Investor Program, receipt number RCW1635754948.

After a review of the evidence submitted in support of the above-referenced Form I-924, USCIS is requesting the full legal name and date(s) of birth for the additional management companies/agencies, regional center principals, agents, individuals, or entities who are or will be involved in the management oversight, and administration of the regional center as requested in Part 3 Section D of the Form I-924.

Please respond within 10 business days of the date of this email with the requested information. If no response is received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition submitted.

Most Sincerely,
Immigrant Investor Program Office
CT0020

Worley, Jordan P

From: John Shen [REDACTED] (b)(6)
Sent: Tuesday, June 20, 2017 4:28 PM
To: USCIS Immigrant Investor Program
[REDACTED] (b)(6)
Cc:
Subject: Regional Center ID: ID1031910173 American Lending Center request of correction of online I-526 I-829 records

Follow Up Flag: Follow up
Flag Status: Completed

Dear Officer,

On behalf of American Lending Center (formerly US Employment Development Lending Center, Regional Center ID 1031910173), I am writing to request following corrections on the newly published spreadsheet "Number of Approved and Denied Forms I-526" and "Number of Approved and Denied Forms I-829" linked on your website.

In the I-526 spreadsheet, under American Lending Center, the number of approved I-526 cases is currently listed as 71 and the number of denied I-526 cases is currently listed as 27. They are both incorrect.

Based on our record, between January 1, 2014 and May 31, 2017, American Lending Center had [REDACTED] I-526 approvals and [REDACTED] (b)(4) [REDACTED] I-526 denials.

There are two other regional centers listed in the I-526 spreadsheet: United States Development Lending Center LLC [REDACTED] [REDACTED] and US Employment Development Lending Center [REDACTED] I suspect that both are in fact American Lending Center. (b)(4) Please confirm and if yes, delete those two.

In the I-829 spreadsheet, the United States Employment Development Lending Center should be American Lending Center (formerly US Employment Development Lending Center). Please correct the name. The number of approvals is correct [REDACTED] (b)(4)

If you need to see all these approval/denial notices, please do not hesitate to let me know. They are available anytime. Meanwhile, I am sending an overnight package to you to provide a hard copy of all these approvals/denials.

Thank you for your assistance.

John Shen – Chief Executive Officer

Regional Centers Holding Group Inc.



1 World Trade Center, Suite 1130, Long Beach, CA 90831
562-449-0139 office•562-449-0079 fax

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the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.

(b)(6)

Worley, Jordan P

From: John Shen [REDACTED]
Sent: Thursday, March 16, 2017 8:50 AM
To: USCIS Immigrant Investor Program
[REDACTED]
Cc: [REDACTED]
Subject: RE: Request For Clarification-American Lending Center (formerly known as US Employment Development Lending Center) RCW1526752996

Follow Up Flag: Follow up
Flag Status: Completed

Dear officer,

We do not have an attorney on record for this I-924 amendment application for approval of an I-526. Please let us know the current status of this case. Thanks.

John Shen – Chief Executive Officer

Regional Centers Holding Group Inc.



1 World Trade Center, Suite 1130, Long Beach, CA 90831
562-449-0139 office•562-449-0079 fax

CONFIDENTIALITY NOTE: The information transmitted, including attachments, is intended only for the person(s) or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and destroy any copies of this information.

From: USCIS Immigrant Investor Program [mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov]

Sent: Wednesday, March 15, 2017 5:59 AM

To: John Shen [REDACTED]

Cc: [REDACTED]

Subject: Request For Clarification-American Lending Center (formerly known as US Employment Development Lending Center) RCW1526752996

Dear Mr. John Shen,

In reviewing US Employment Development Lending Center's I-924 amendment application (RCW 1526752996) for approval of an I-526 exemplar; USCIS notes the following issue regarding your application:

Attorney Representation (8 CFR 103.2(a)(3))

Part 5 of the Form I-924 lists [REDACTED] as the preparer of the Form. However, the G-28 box was not checked, nor was the Form G-28 submitted. Please submit a properly executed Form G-28.

Please respond within 10 business days of the date of this email. If a response is not received within 10 days, we will proceed with the adjudication (including the issuance of a Request for Evidence, as appropriate) of your petition as submitted. Should you need additional time to respond, please respond to this email with your request and a Request for Evidence (RFE) will be issued. The RFE will afford you 87 days to respond.

Additionally, if you respond via mail, please send an email to this email address indicating that you mailed in your response.

Sincerely,

Immigrant Investor Program
U.S. Citizenship and Immigration Services
EC-0007

Worley, Jordan P

From: USCIS Immigrant Investor Program
Sent: Tuesday, January 05, 2016 8:48 AM
To: (b)(6)
Subject: RE: RESPONSE -- AMENDED REQUEST FOR CLARIFICATION US EMPLOYMENT DEVELOPMENT LENDING CENTER LLC [ID1031910173]
Attachments: I-924 Acknowledgment of Name Change_American Lending Center LLC.doc

Follow Up Flag: Follow up
Flag Status: Completed

Mr. Shen,

The USCIS Immigrant Investor Program Office mailed a letter acknowledging the name change for American Lending Center LLC. Attached please find a letter from USCIS acknowledging the name change.

Sincerely,

Immigrant Investor Program Office
U.S. Citizenship and Immigration Services
MS 00015

From: John Shen [mailto:(b)(6)]
Sent: Friday, November 13, 2015 7:57 PM
To: USCIS Immigrant Investor Program
Subject: RE: RESPONSE -- AMENDED REQUEST FOR CLARIFICATION US EMPLOYMENT DEVELOPMENT LENDING CENTER LLC [ID1031910173]

Dear Officer,

After careful consideration, to avoid any potential violation of federal laws, US Employment Development Lending Center, LLC (ID1031910173) has changed its name to American Lending Center, LLC. The regional center name will be "American Lending Center Regional Center". Please see the change reflected in the Business Entity Detail information provided by the California Secretary of State attached to this email. Please also see the executed amendment filed and confirmed with the California Secretary of State.

In conjunction with the change, we are requesting an amended designation letter which reflects the name change in order to avoid confusion for all future projects which are currently in the process of being funded. Please mail the amended designation letter to the following office address:

American Lending Center, 1 World Trade Center, Suite 1130, Long Beach, CA 90831 (562) 449 0139 (office)

Thank you for your time.

John Shen, Chief Executive Officer

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American Lending Center



1 World Trade Center, Suite 1130, Long Beach, CA 90831
562-449-0139 office • 562-449-0079 fax • [REDACTED] mobile (b)(6)

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From: USCIS Immigrant Investor Program [mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov]
Sent: Wednesday, October 14, 2015 3:46 PM
To: [REDACTED] (b)(6)
Cc: [REDACTED]
Subject: RESPONSE -- AMENDED REQUEST FOR CLARIFICATION US EMPLOYMENT DEVELOPMENT LENDING CENTER LLC [ID1031910173]

Dear Mr. Shen:

Thank you for your email reply noting that the regional center name is "US EMPLOYMENT DEVELOPMENT LENDING CENTER LLC." Our records reflect that this name appears on the regional center designation letter issued to the regional center. However, the issue raised in the Request for Evidence remains unresolved.

Please note that Regional center and related commercial enterprises that utilize names that contain the words "United States," "U.S.," "US" and "Federal" may falsely imply a relationship between the entity using the name, and USCIS, DHS and the United States Government. In addition, use of such names on websites, promotional and other marketing materials may be considered deceptive acts or practices and false advertisements in violation of Federal laws governing unfair trade and false advertisements. See 15 U.S.C. §§ 45 and 52. IPO may refer regional centers and related commercial enterprises with questionable naming conventions to the Federal Trade Commission for further action.

Additionally, use of the words "Federal" or "United States," in advertising by businesses engaged in the financial services sector may be a violation of 18 U.S.C. § 709, which prohibits false advertising or misuse of names to indicate Federal agency. IPO may refer regional centers and related commercial enterprises with questionable naming conventions to the Department of Justice for further action.

Due to the fact that the Regional Center's name contains the word "US," the Regional Center may be in violation of laws as described above. Please submit evidence that the regional center has adopted a name that does not contain words that may be in violation of U.S. law.

Please respond within 90 business days of the original date of the Request for Clarification via email to: USCIS.ImmigrantInvestorProgram@uscis.dhs.gov. Should you need additional time to submit the requested evidence, please respond to this email with your time extension request. Please note, it is not necessary to resubmit the evidence attached to your September 15, 2015 email response. However, if you wish to submit additional evidence, you may do so.

Sincerely,

Immigrant Investor Program
U.S. Citizenship and Immigration Services
DA0018

From: John Shen [mailto:[REDACTED]] (b)(6)
Sent: Tuesday, September 15, 2015 7:39 PM

To: USCIS Immigrant Investor Program
Subject: RE: REQUEST FOR CLARIFICATION UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER LLC
[ID1031910173]

Dear Officer,

Please note that our regional center name is "US Employment Development Lending Center" and not "United States Employment Development Lending Center" as written by USCIS. Our current mailing address is 1 World Trade Center, Suite 1130, Long Beach, CA 90831. See attached Business Entity Detail information from the CA Secretary of State website and please update the information on record if necessary.

If possible, our regional center would like to continue to use the name "US Employment Development Lending Center" or "USEDLC" for short, and do not believe doing so would be in violation of U.S. law. The regional center has a legitimate business reason for using the name. The regional center contracts with various registered foreign agents in China who market investment immigration to various countries all over the world. It is necessary to identify the regional center as one that engages in investment immigration in the United States to inform the public about the nature and geographic location of the business.

In addition, we believe that our name in no way falsely implies a relationship between our company and either USCIS, DHS, or the United States Government. Both "US Employment Development Lending Center" and "USEDLC" do not sound like and are not similar to the name of any federal or state government agency in existence. We are first and foremost a "Lending Center" which is traditionally associated with private lending services and do not have the words "Federal", "Government", "Agency", or "Administration" in our name to imply any association with the government. However, given the agency's concerns regarding the potential for the company to mislead the public, we have taken significant measures to avoid confusion regarding any implication of association with USCIS, DHS, or the United States Government. Our marketing brochure now contains a disclaimer at the top of the very first page stating that "*US Employment Development Lending Center, LLC is a private, for-profit entity and is not owned, controlled, affiliated with, or supervised by the U.S. Federal Government or any agency, branch, or office thereof.*" The regional center website also contains this disclaimer and all future email signature lines will contain this disclaimer as well. Please see the attached marketing brochure and screenshot from our current website.

USEDLC has worked hard to successfully build its brand reputation for over five years since its formal designation as a regional center on April 12, 2010. To date, we have approximately 45 Form I-526 approvals, over 132 pending EB-5 petitions, with more than 180 total investors. We have contracted with various foreign immigration agents all over China who are familiar with our company and the integrity of our business. USEDLC is also a well-established and licensed California Finance Lender regulated under the CA Department of Business Oversight. Our current California Finance Lender license is attached to this email. Therefore, any change to our current name would greatly affect our marketing efforts in China as well as our finance reputation in the state. Our regional center name was never intended to imply any relationship with USCIS, DHS, or the United States Government, and the disclaimers we have put in place help to ensure that we do not mislead or falsely imply any such affiliation. It is our sincere hope that USCIS and the FTC will allow us to continue to use the good name and reputation we have striven so tirelessly to preserve. Thank you.

John Shen, Chief Executive Officer

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US Employment Development Lending Center



1 World Trade Center, Suite 1130, Long Beach, CA 90831

562-449-0139 office • 562-449-0079 fax [redacted] mobile (b)(6)

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Disclaimer: US Employment Development Lending Center, LLC is a private, for-profit entity and is not owned, controlled, affiliated with, or supervised by the U.S. Federal Government or any agency, branch, or office thereof.

From: USCIS Immigrant Investor Program [<mailto:USCIS.ImmigrantInvestorProgram@uscis.dhs.gov>]

Sent: Sunday, August 16, 2015 8:27 PM

To: [REDACTED] **Subject:** REQUEST FOR CLARIFICATION UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER LLC [ID1031910173] (b)(6)

Dear UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER LLC Principal:

UNITED STATES EMPLOYMENT DEVELOPMENT LENDING CENTER LLC ("the Regional Center") applied for designation as a regional center on 07/22/2009. On 4/12/2010, USCIS designated the Regional Center as a regional center and authorized its participation in the Immigrant Investor Program.

In reviewing the Regional Center's I-924A filing for fiscal year 2014, RCW1434552081, USCIS notes the following:

Regional center and related commercial enterprises that utilize names that contain the words "United States," "U.S.," "US" and "Federal" may falsely imply a relationship between the entity using the name, and USCIS, DHS and the United States Government. In addition, use of such names on websites, promotional and other marketing materials may be considered deceptive acts or practices and false advertisements in violation of Federal laws governing unfair trade and false advertisements. See 15 U.S.C. §§ 45 and 52. IPO may refer regional centers and related commercial enterprises with questionable naming conventions to the Federal Trade Commission for further action.

Additionally, use of the words "Federal" or "United States," in advertising by businesses engaged in the financial services sector may be a violation of 18 U.S.C. § 709, which prohibits false advertising or misuse of names to indicate Federal agency. IPO may refer regional centers and related commercial enterprises with questionable naming conventions to the Department of Justice for further action.

Due to the fact that the Regional Center's name contains the words "United States," the Regional Center may be in violation of laws as described above. Please submit evidence that the regional center has adopted a name that does not contain words that may be in violation of U.S. law.

Please respond within 90 business days of the date of this email via email
to: USCIS.ImmigrantInvestorProgram@uscis.dhs.gov. Should you need additional time to submit the requested evidence, please respond to this email with your time extension request.

Sincerely,

Immigrant Investor Program
U.S. Citizenship and Immigration Services
DA0018